

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION**

*This Document Relates to All Actions*

**MDL No. 2875**

**Case No. 1:19-md-02875-RBK-JS**

**Judge Robert B. Kugler**

**Magistrate Judge Joel Schneider**

**DEFENDANTS' LOCAL RULE 37.1(b) CERTIFICATION**

Pursuant to Local Rule 37.1(b) and the Court's October 22, 2019 Order (Dkt. 280), the undersigned counsel hereby certifies that Defendants met and conferred with Plaintiffs on the "macro" discovery issues discussed in the foregoing letter brief by telephone on October 15, 2019 and November 4, 2019, in a good faith effort to resolve by agreement the issues raised in the brief. The Parties have reached agreement as to issues 7 (privilege logs) and 8 (responsibility for cost of translation), as explained in the letter brief. The Parties have been unable to reach agreement on the remaining issues addressed in the letter brief.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 5, 2019

/s/ Seth A. Goldberg

Seth A. Goldberg